



Department of Energy  
Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

0072945

07-AMRC-0199

MAY 21 2007

Ms. A. L. Boyd  
Hanford Project Office  
U. S. Environmental Protection Agency  
309 Bradley Boulevard, Suite 115  
Richland, Washington 99352

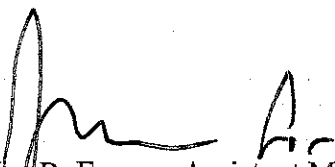
Dear Ms. Boyd:

U. S. ENVIRONMENTAL PROTECTION AGENCY (EPA) COMMENTS ON  
DOE/RL-2004-77, DRAFT A, REMOVAL ACTION WORK PLAN #1 FOR THE  
300 AREA FACILITIES, REVISION 1

The U.S. Department of Energy, Richland Operations Office, has been working to address the comments provided in your letter of December 29, 2006, same subject as above. The revised removal action work plan is not expected to be ready for EPA's review until after the draft 300 Area Mitigation Plan is completed which will address long-term retained facilities. However, attached are comment responses related to your December 29, 2006 letter.

Please address any concerns related to the attached comment responses to Rudy Guercia, of my staff, on (509) 376-5494.

Sincerely,

  
Joe R. Franco, Assistant Manager  
For the River Corridor

AMRC:RFG

Attachment

cc w/attach:

F. W. Bond, Ecology  
M. L. Proctor, WCH  
D. M. Yasek, WCH

Administrative Record, 300-FF-2 Facilities H-0-7

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## ATTACHMENT

### **Response to EPA Comments on DOE/RL-2004-77, Rev. 1 Draft A, Removal Action Work Plan #1 for the 300 Area Facilities**

1. **Comment:** Perhaps the name should be changed (delete the #1) since this version is supposed to replace RAWP #1, #2, and cover buildings under Action Memo #3. An explanation of this coverage should be clarified in the introduction. (The current intro is a bit hard to understand.)  
**Response:** The document name was modified to remove the “#1” and the introduction was modified to better explain consolidation of the three evaluations into one RAWP.
2. **Comment:** Table 1-1 should have, for each building demolished, information on what authority the D4 took place under (AM #1, AM #2, DOE separate authority). This information should also extend to active facilities if they are listed in a particular AM.  
**Response:** A column was added to Table 1-1 to specify the removal action authority.
3. **Comment:** Section 2.6, Site Closure, 1<sup>st</sup> two paragraphs. Some form of verification sampling will be needed, not just field sampling and visual inspection. This topic will be discussed at the January Unit Manager’s Meeting.  
**Response:** Modified wording from “closure” to “completion” in an attempt to eliminate confusion.
4. **Comment:** Section 4.2.3, Waste Handling. Please add the following footnote to the list of existing offsite determinations. “EPA will notify DOE in writing of any change in the offsite determination of these listed facilities.”  
**Response:** Requested footnote was added.
5. **Comment:** Section 4.2.3.4, Solid Waste section, last sentence. Please add the footnote regarding “de minimis concentration” from Action Memo #3. **“De minimis is not a CERCLA defined term, but is used to convey the notion that there are some items with very low levels of CERCLA hazardous substances where the CERCLA process does not apply.”**  
**Response:** Requested footnote was added.
6. **Comment:** Section 4.2.3.4, Asbestos section. The second paragraph of the asbestos section should be modified to include new text: “All friable and most nonfriable ACMs and presumed ACMs will be removed prior to demolition of the area. **Trained Asbestos certified workers will be used as well as oversight provided by a competent person trained in Asbestos regulations. This competent person must be on site at all times that work is being performed on ACMs.**”  
**Response:** Requested text was added to the section.
7. **Comment:** Section 4.3.1, next to last paragraph. Wording is currently unclear. The Hanford Site Air Operating Permit cannot be considered obsolete until the substantive regulatory requirements associated with those facilities is included in the work plan (which is not currently the case). The State of Washington Department of Health Licenses, and Hanford Air Operating Permits are in effect and current until the removal action work plan includes all substantive requirements.

**Response:** Last sentence of the paragraph was modified to read “The terms and conditions contained in the Washington State Department of Health License, the Washington State Department of Ecology Approval Orders, and the Hanford Site Air Operating Permit will be considered obsolete upon incorporation of the facility-specific substantive regulatory requirements from the AOP, into an EPA approved removal action work plan.

8. **Comment:** Section 4.3.2, first paragraph, last sentence. How does one differentiate between uncontaminated and contaminated stormwater? Some explanation of when stormwater will be sampled is needed (or under what circumstances stormwater would be considered contaminated).

**Response:** Text was modified to include an example qualifier of what would be considered contaminated stormwater.

9. **Comment:** Section 4.3.2, last paragraph. I recall submitting this comment on a similar document, may have been the RAWP #3. Please describe in plain terms why the discharges did not meet the applicability requirements of the NPDES permit (I believe it had to do with discharges not reaches particular drains or the river).

**Response:** Approved text from Action Memorandum #3 was used to replace the sentence.

10. **Comment:** Section 5.1, last paragraph. The schedule should support completion of the entire M-94 series of milestones (00, 03, 06-09), not just milestone M-94-00.

**Response:** Inserted the word “series” at the end of the sentence.

11. **Comment:** Reference section. All Action Memos (#1, #2, #3) should be listed with DOE as the author, not EPA.

**Response:** Reference was revised in the document to reflect DOE rather than EPA.

12. **Comment:** Air Monitoring Section B.2, Airborne Source Information, 2<sup>nd</sup> paragraph, and Table B-1. Please remove text discussing the possibility of not performing emission estimates. If, after characterization, facilities will be deactivated, decontaminated, decommissioned and demolished unless authority other than CERCLA, no PTE needs to be calculated and submitted to EPA. If a facility is demolished under CERCLA, a PTE must be submitted to EPA. Some smaller facilities, such as boiler annexes or construction trailers with biological contamination, may be grouped for emissions calculations, in order to limit the number of calculations performed.

**Response:** Text has been modified to better reflect the approach being implemented for considering emission estimates for minor facilities.

13. **Comment:** Related to comment #12. The air monitoring plan should include a summary table of potential to emit calculations performed up to that date, grouped by calendar year based on the time the emission potential existed. As new PTE calculations are accepted, the table should be updated to reflect the additional calculations. These updates can be documented in the UMM minutes.

**Response:** A new table was incorporated into the AMP.

14. **Comment:** Air Monitoring Section B.2, Airborne Source Information, 5<sup>th</sup> paragraph. Please substitute the last sentence “The additional monitoring requirements... in UMM minutes.” with the following: “Any additions or changes to this work plan will be documented in UMM minutes.”

**Response:** Text was modified as requested.

15. **Comment:** Air Monitoring Section B.3, 2<sup>nd</sup> bullet. Modify the sentence to include any contaminated debris or soils that will be inactive for more than 24 hours.  
**Response:** Text was modified as requested.
16. **Comment:** Air Monitoring Section B.4, 1<sup>st</sup> paragraph, 1<sup>st</sup> sentence. Please add the following text "in accordance with 40 CFR 61, Appendix B, Method 114(3) and WAC 246-247-075(3)."  
**Response:** Text was modified as requested.
17. **Comment:** Air Monitoring Section B.5, 2<sup>nd</sup> paragraph, last sentence. The RAWP and associated Air Monitoring Section will not become the air emissions approval for the facility until after substantive requirements of WDOH Approval Orders and the Hanford Site Operating Permit have been included in an approved update. Until that date, any CERCLA D4 activities will still be subject to the existing State of Washington permits and licenses.  
**Response:** A sentence was added to the end of the paragraph to state "If the emission unit is not shut down prior to transition to CERCLA, D4 activities will be subject to the existing State of Washington permits and licenses."
18. **Comment:** Air Monitoring Section B.5.1, Radiological Counting Facility. Please ensure that all information in the approved *Radiological Counting Facility Air Monitoring Plan* is included in this section.  
**Response:** Text was revised to be consistent with the approved AMP.
19. **Comment:** Air Monitoring Section B.6, References. Please include the *Radiological Counting Facility Air Monitoring Plan*.  
**Response:** The reference was added.